

## **FACT SHEET**

### **INTENT TO DENY THE PERMIT RENEWAL APPLICATION AND TERMINATE THE EXISTING HAZARDOUS WASTE MANAGEMENT PERMIT**

FACILITY NAME: Clean Harbors Antioch, LLC (CHA)

LOCATION: 1640 Antioch Pike  
Antioch, Tennessee 37013  
Davidson County

OWNER/OPERATOR: Clean Harbors Antioch, LLC  
1640 Antioch Pike  
Antioch, Tennessee 37013

FACILITY CONTACT: Ms. Susan Sevy  
Compliance Manager  
Clean Harbors Antioch, LLC  
1640 Antioch Pike  
Antioch, Tennessee 37013  
Tel: 800-368-4244 ext 227  
Fax No.: 216-833-1918

EPA ID No.: TND 00 077 2277

UNITS: Tanks and Containers

COMMENT PERIOD: Begins: December 12, 2005  
Ends: January 25, 2006

### **FACILITY BACKGROUND**

Clean Harbors Antioch, LLC (CHA) was an existing commercial waste management facility that provided hazardous and non-hazardous waste management services to a broad customer base. The customers included manufacturing industries and other waste generating sources such as universities, research and development facilities, and government agencies. The various hazardous and non-hazardous wastes were received in containers. These wastes were either treated or discharged to the Metro Nashville sanitary sewer system; blended and consolidated for resale or off-site treatment or disposal in approved facilities; or chemically stabilized for off-site disposal in approved hazardous waste or non-hazardous solid waste landfills. Majority of the wastes received were wastewaters that were amenable to treatment and discharged to the Metro Nashville sanitary sewer system.

### **PROPOSED ACTION:**

The purpose of this Fact Sheet is to explain the Division of Solid Waste Management (DSWM), Tennessee Department of Environment and Conservation (TDEC)'s intent to

deny the renewal permit and to terminate the existing hazardous waste container and tank storage and treatment permit. The tentative decision to deny the permit is directed by the applicant's request to withdraw the permit renewal application. The tentative decision to terminate the existing permit is based on the permittee's closure of the units.

The hazardous waste storage and treatment permit, TNHW-082, was first issued to Tricil Environmental Services, Inc. on September 30, 1992. It was effective for ten years and was to expire on September 30, 2002. Through mergers, the facility name changed to Safety-Kleen (WT), Inc. (hereinafter, SK) in 1998. SK submitted their permit renewal application on April 1, 2002, six months before the expiration date, thus enabling the facility to continue to operate under the existing permit until a final decision was made. Previous public notice opportunities were provided by SK with a pre-application meeting public noticed on January 11, 2002, and held on February 11, 2002. The receipt of Part A and Part B applications were public noticed by DSWM on April 29, 2002. The renewal application proposed no new hazardous waste storage and treatment activities in the tanks other than those already currently permitted. The type of wastes accepted were Oil/Water Mixtures, Acidic Wastes, Caustic/Alkaline Wastes, Spent Pickle Liquors, Metal-Bearing Wastes, Base/Neutral Wastes, Miscellaneous Liquids, Slurry Sludges, and Lab Packs. The proposed Container Storage capacity was 36,840 gallons.

The formerly permitted Tank Farm consisted of aboveground hazardous waste storage/treatment tanks. It included 10 existing constructed tanks and portions of their ancillary equipment. These tanks were designated as A-1, A-2, A-3, A-4, A-6, A-7, A-8, A-9, S-1, and S-2. The storage capacities for tanks A-1, A-6, A-7, A-8, and A-9 were 24,737 gallons each; for tank A-2, 24,013 gallons, for tanks A-3 and A-4, 23,297 gallons each; and for tanks S-1 and S-2, 15,016 gallons each. There were also two additional tanks, A5 and S3, that were formerly permitted at this Tank Farm that had not been constructed yet. Their storage capacities were 24,737 and 15,016 gallons respectively. The total storage capacity of these twelve tanks were 264,077 gallons and the treatment capacity was 132,000 gallons per day.

In the proposed permit renewal there was to be a Stabilization Unit which included a Mix Tank, ST-1. It was to be installed and operated within the existing wastewater treatment unit tank T-7, an in-ground concrete structure. Its proposed storage capacity was 24,415 gallons and treatment capacity was 744 short tons per day.

CHA acquired the facility from SK on September 6, 2002. During the processing of the draft permit, CHA submitted its intention to close the existing hazardous waste container and tank units on September 29, 2003. Three extensions were requested by the permittee to complete closure of the facility from initial 180 days to 563 days. The initial date of closure commencement was January 15, 2004 and the date to complete closure was on or before July 15, 2004. The first extension of 100 days was until November 12, 2004, the second extension was until May 10, 2005, and the third extension was from May 11, 2005 until August 1, 2005. After completion of closure activities, CHA submitted a partial certification of closure on June 8, 2005, followed by a final certification of closure on August 1, 2005. These units were inspected on August 9, 2005, with approval on September 12, 2005.

All activities authorized in the existing permit as part of the container and tank storage operation will terminate on the effective date the notice of termination of a permitted activity document is signed. After the effective date, no further activities involving the

container and tank storage is effective and if, in the future, the Permittee wishes to conduct such operations, a permit must be applied for and obtained from this Department in accordance with Rule 1200-1-11-.07.

Also included as part of the draft and existing permits were the conditions for continuing corrective action of the SWMUs and AOCs. Pursuant to this permit, CHA was required to investigate any releases of hazardous waste or hazardous constituents at the facility, regardless of the time at which waste was placed in a unit, and to take appropriate corrective action for any such releases. The facility has been inspected by the Division and the SWMUs and AOCs require no further action.

All relevant and substantive comments received by the comment deadline of 4:30 p.m., CST, January 25, 2006, will be assured of consideration by the Department in formulating its final decision. After the DSWM has reviewed and addressed the comments from interested parties, final decisions will be made.

### **INFORMATION/COMMENTS**

For further information, contact Ms. Susan Sevy at 800-368-4244 ext. 227, or write her at Clean Harbors Antioch, LLC., c/o Clean Harbors Environmental Services, Inc., 2930 Independence Road, Cleveland, OH 44115.

DSWM is hereby notifying interested members of the public that the notice of intent to deny the permit renewal application and to terminate the existing hazardous waste management permit; a Fact Sheet; and documents pertaining to the closure, are available for review and comment. Interested persons may review these materials at any of the following locations: Southeast Branch Public Library, 2325 Hickory Highlands Drive, Antioch, Tennessee (telephone 615-862-5871), TDEC Nashville Field Office, Public Access Area, 711 R. S. Gass Blvd, Nashville, Tennessee 37243 (telephone 615-687-7000). Normal state office hours are 8:00 a.m. to 4:30 p.m., Monday through Friday, except legal holidays.

All persons who believe that the tentative decision to issue a denial of the permit renewal application and termination of the existing hazardous waste management permit; is inappropriate must raise all ascertainable issues and submit all available arguments and factual grounds supporting their position by January 25, 2006.

Any interested person wishing to obtain further information, request a public hearing, or to comment on the proposed permit actions should submit requests or comments to: Ms. Dilraj Mokha; Treatment, Storage, and Disposal Section; Division of Solid Waste Management; Tennessee Department of Environment and Conservation; 5th Floor, L&C Tower; 401 Church Street; Nashville, Tennessee 37243-1535; telephone: 615-532-0821; fax 615-532-0348; or e-mail: Dilraj.Mokha@state.tn.us.